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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MOBIUS CONNECTIONS GROUP, INC., a
Nevada corporation,

vs.
Plaintiff,

TECHSKILLS, LLC, a foreign Limited
Liability Company; DOES I-X and ROES I-X,
inclusive,

Defendants.

Case No. 2:10-cv-01678-GMN-RJJ

**STIPULATED DISCOVERY PLAN
AND SCHEDULING ORDER**

**SPECIAL SCHEDULING REVIEW
REQUESTED**

Plaintiff Mobius Connections Group, Inc., and defendant TechSkills, LLC, through their respective counsel, hereby submit the following proposed Stipulated Discovery Plan and Scheduling Order pursuant to Federal Rule of Civil Procedure 26(f) and Local Rule 26-1.

1. **Conference:** Pursuant to Federal Rule of Civil Procedure 26(f), counsel for the parties conferred telephonically on December 1, 2010. As required, during this conference counsel considered the nature and basis of their client's claims and defenses and the possibility of prompt settlement of this action. Counsel discussed the timing and other arrangements pertaining to the initial disclosures required by Rule 26(a)(1), discussed issues concerning preservation of discoverable information and developed a proposed discovery plan.

1 2. **Discovery Plan:**2 3 A. Initial Disclosures: Pursuant to Rule 26(a)(1)(C), and by agreement
4 of the parties, the parties will exchange initial disclosures no later than January 14,
5 2011. While this date is approximately seventy-five (75) days after the filing of
6 TechSkills' answer and approximately forty-five (45) days after the parties' Rule
7 26(f) conference, the extension is required in order to allow sufficient time for the
8 parties, and, in particular, TechSkills, to review voluminous potentially relevant
9 emails and other electronically-stored information.10 11 B. Areas of Discovery: Discovery will be needed to address all issues,
12 including all claims and defenses within the scope of the parties' pleadings.13 14 C. Discovery Cut-Off Date: The parties propose a discovery cutoff
15 date of July 13, 2011, which is one hundred eighty (180) days following the
parties' proposed deadline for serving initial disclosures.16 17 D. Amendments to Pleadings and Addition of Parties: Pursuant to
18 Local Rule 26-1(e)(2), the parties shall have until April 14, 2011 to file any
19 motions to amend the pleadings or to add parties. This date is ninety (90) days
20 before the parties' proposed discovery cut-off date.21 E. Federal Rule of Civil Procedure 26(a)(2) Expert Disclosures:
22 Disclosure of experts shall be made no later than May 16, 2011, which is the next
23 closest day to sixty (60) days before the parties' proposed discovery cut-off date.
24 Disclosures of any rebuttal experts shall be made no later than June 13, 2011,
25 which is within thirty (30) days after the parties' initial disclosure of experts.26 F. Interim Status Report: Pursuant to Local Rule 26-3, the parties shall
27 submit an interim status report no later than May 16, 2011, which is the next closest
28 day to sixty (60) days before the parties' proposed discovery cut-off date.

G. Dispositive Motions: Pursuant to Local Rule 26-1(e)(4), the parties shall have until August 12, 2011 to file dispositive motions. The date is within thirty (30) days after the parties' proposed discovery cut-off date.

H. Pretrial Order: Pursuant to Local Rule 26-1(e)(5), the joint pretrial order shall be filed by September 9, 2011. This date is within thirty (30) days after the deadline for filing dispositive motions. In the event that dispositive motions are filed, the date for filing the joint pretrial order shall be suspended until thirty (30) days after decision on such motion(s) or further order of the Court. The disclosures required by Federal Rule of Civil Procedure 26(a)(3), and any objections thereto, shall be made in the joint pretrial order.

3. Limitations on Discovery: At this time, the parties propose no changes to the form or scope of discovery imposed by the Federal Rules of Civil Procedure or the Local Rules, other than the extension of certain deadlines as noted above. The parties, however, reserve their right to seek changes to the limitations on the form or scope of discovery, as and if necessary, at a later date.

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1 4. **Court Conference:** The parties do not believe that a conference is
2 necessary, unless the Court feels it would be useful to hear from the parties with respect to their
3 proposed scheduling plan.
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5 DATED: December 13, 2010.
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REYNOLDS & ASSOCIATES

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17 **ORDER**

18 IT IS SO ORDERED:

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21 UNITED STATES MAGISTRATE JUDGE
22 DATED: DEC. 20, 2010
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